

UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In re: Gary A. Falcone and Tina	:	Case No. 19-70601-JAD
L. Falcone,	:	
Debtors	:	
	:	Chapter 13
CSMC 2019-JR1 Trust,	:	
Movant	:	
v.	:	Respondents' Response to the
	:	Motion for Relief from the
Gary A. Falcone and Tina L.	:	Automatic Stay
Falcone,	:	
Respondents	:	Hearing Date: January 8, 2021
v.	:	
	:	Document No.
Ronda J. Winnecour, Trustee,	:	
Additional Respondent	:	

Now come the Respondents and file this Response to the Movant's Motion.

1. The primary purpose of this Chapter 13 case was to preserve for the Debtors their home, which is the subject of the Movant's motion.

2. Due to the Covid pandemic, the Respondents income was substantially reduced starting in March of this year. The Respondent Tina L. Falcone was self employed working in nursing homes; the pandemic eliminated her ability to earn any income from employment.

3. Due to federal legislation, the Respondent did qualify for some unemployment benefits, and when there was a "bonus" of \$600, the Respondents were able to struggle and make some payments. However,

when that expired the Respondents were unable to make payments.

4. The Respondents intend to file an amended Chapter 13 Plan, in order to address the deficiency in payments.

Wherefore, the Respondents pray for the entry of an Order denying the request of the Movant, and for such other relief as is just.

Respectfully submitted,

/s/Michael N. Vaporis
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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing was electronically served on the Movant's attorney, Melissa Hansler, Esquire, on December 1, 2020.

/s/Michael N. Vaporis